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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION
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17 DONALD R. CAMERON, a California
resident; and PURE SWEAT
18 BASKETBALL, INC., an Illinois
corporation, on behalf of themselves and all
19 others similarly situated,

20 Plaintiffs,

21 v.

22 APPLE INC., a California corporation,

23 Defendant.
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CASE NO. 3:19-cv-03074-WHA

**STIPULATION FOR EXTENSION OF TIME
FOR DEFENDANT APPLE INC. TO
ANSWER OR OTHERWISE RESPOND TO
COMPLAINT PURSUANT TO CIVIL
LOCAL RULE 6-1(a)**

The Honorable William Alsup

1 Plaintiffs Donald R. Cameron and Pure Sweat Basketball, Inc. (“Plaintiffs”) and Defendant
2 Apple Inc. (“Apple”), through their respective attorneys of record herein and without waiving any
3 rights, claims, or defenses they have in this action, enter into this Stipulation pursuant to Civil Local
4 Rule 6-1(a), with reference to the following circumstances:

5 WHEREAS, Plaintiffs filed their Complaint on June 4, 2019;

6 WHEREAS, Apple was served with the Complaint on June 13, 2019;

7 WHEREAS, Apple believes that this case is “related” to *In re Apple iPhone Antitrust*
8 *Litigation*, No. 4:11-cv-06714-YGR (N.D. Cal.) (“*Pepper*”), which is pending before Judge
9 Gonzalez Rogers. On June 21, 2019, Apple filed an Administrative Motion to Consider Whether
10 Cases Should Be Related;

11 WHEREAS, Plaintiffs disagree with Apple’s position and filed their opposition to Apple’s
12 motion on June 25, 2019;

13 WHEREAS, on June 27, 2019, Judge Gonzalez Rogers issued an Order Allowing
14 Additional Submissions Regarding Pending Motion to Relate, expressing that “the Court is inclined
15 to grant [Apple’s] motion” to relate this case to the *Pepper* case and ordered “supplemental
16 briefing” due by July 8, 2019, *see* Dkt. 150, *Pepper*, 4:11-cv-06714-YGR;

17 WHEREAS, Apple’s response to the Complaint is currently due on July 5, 2019;

18 WHEREAS, the parties met and conferred by telephone on June 25, 2019, June 29, 2019,
19 and July 2, 2019 and agree to extend Apple’s time to respond to the Complaint by 60 days (August
20 12, 2019);

21 WHEREAS, in the event any other application developer files a putative class action against
22 Apple, alleging substantially similar claims to those asserted in Plaintiffs’ Complaint, Apple agrees
23 that it will respond to Plaintiffs’ Complaint before responding to any such substantially similar
24 application developer Complaint, unless otherwise ordered by the Court;

25 WHEREAS, no other time modifications have been requested with respect to the briefing
26 of any motion to dismiss;

27 WHEREAS, this extension will not alter or otherwise impact the date of any event or any
28 deadline already fixed by Court order;

1 THEREFORE, the parties, through their counsel, hereby stipulate as follows:

2 1. Apple's deadline to respond to the Complaint is August 12, 2019.

3 2. Apple shall not respond to any application developer complaint that is substantially
4 similar to Plaintiffs' Complaint before responding to Plaintiffs' Complaint.

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6 **IT IS SO STIPULATED.**
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1 Dated: July 3, 2019

Respectfully submitted,

2 GIBSON, DUNN & CRUTCHER LLP

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11 Dated: July 3, 2019

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18 *Pure Sweat Basketball, Inc.*

ECF SIGNATURE ATTESTATION

In accordance with Local Rule 5-1, the filer of this document hereby attests that the concurrence of the filing of this document has been obtained from the other signatories hereto.

Dated: July 3, 2019

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Richard J. Doren
Richard J. Doren

Attorney for Defendant Apple Inc.